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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
ANTOINE MOUTON,  
  
Defendant.

3:12-CR-00049-RCJ-VPC

STIPULATION TO CONTINUE TRIAL

(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Carla Higginbotham, Assistant United State Attorney, counsel for the United States of America, and Jeremy M. Delicino, counsel for Antoine Mouton, that the calendar call currently scheduled for October 22, 2012 and the trial currently scheduled for October 30, 2012 at 9:00 a.m., be vacated and set to a date and time convenient for this Court; however, no event earlier than (30) days.

This Stipulation is entered into for the following reasons:

1. Counsel for Mr. Mouton needs additional time to confer with Mr. Mouton's counsel in California to see if a global resolution in this matter is possible. While it is anticipated that the instant case will be resolved by plea shortly, counsel would like to confer with Steve Kalar, Mouton's federal attorney in California, to obtain the best resolution for both cases.
2. The defendant does not object to the continuance.
3. The United States agrees to the continuance.
4. The additional time requested herein is not sought for purpose of delay, but merely to allow counsel for the defendant sufficient time to effectively negotiate a global resolution of Mr. Mouton's case, if possible.



UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTOINE MOUTON,

Defendant.

3:12-CR-00049-RCJ-VPC

FINDINGS OF FACT, CONCLUSIONS OF  
LAW AND ORDER

FINDING OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for Mr. Mouton needs additional time to confer with Mr. Mouton's counsel in California to see if a global resolution in this matter is possible. While it is anticipated that the instant case will be resolved by plea shortly, counsel would like to confer with Steve Kalar, Mouton's federal attorney in California, to obtain the best resolution for both cases.

2. The defendant does not object to the continuance.

3. The United States agrees to the continuance.

4. The additional time requested herein is not sought for purpose of delay, but merely to allow counsel for the defendant sufficient time to effectively and thoroughly research, prepare and file appropriate pretrial motions, and prepare for trial.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

